

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	Chapter 13
Jeannine Drost	Bankruptcy Case No. 18-17955
Debtor	

DEBTORS' MOTION FOR AUTHORITY TO SELL REAL ESTATE

Jeannine Drost, by and through her attorney Gary E. Thompson, hereby requests the entry of an Order (a proposed form of which is annexed hereto) approving the sale of real estate, and in support thereof, respectfully represents the following:

1. Debtor filed a voluntary Chapter 13 Bankruptcy on December 3, 2018, bearing case number 18-17955.
2. The Debtor and non-filing partner have disclosed an interest in real property improved by a single family residence located at 627 New Street, Spring City, PA 19475 ("Property") with a first mortgage on the Property in favor of PennyMac Mortgage.
3. After extensively marketing the property and negotiating with various potential buyers, Debtor has entered into an Agreement for the Sale of Real Estate (the "Sale Agreement"), with Kirsten Ebersole and Jennifer Dickson ("Buyers") for \$310,000.00.
4. Given the marketing effort and current economic conditions, the sale on these terms approximates the fair market value of the property.

5. The terms of the Proposed Sale are fair and equitable and that any delay in consummating the Proposed Sale may result in the loss of Buyers as a potential purchaser, in which case a sale on more favorable terms may not be possible.
6. Out of the proceeds from the Sale, the secured lienholder, PennyMac Mortgage will be paid in full.
7. Debtor's Confirmed Chapter 13 Plan includes a pro-rata share to Unsecured Creditors and Debtor will continue to maintain current payments on the Plan to the Standing Trustee, William Miller.
8. Accordingly, the Debtor request entry of the proposed order, substantially in the form annexed hereto, which would approve the terms and conditions of the sale.

WHEREFORE, the Debtor respectfully requests entry of an Order, substantially in the form annexed hereto, granting the relief requested in the Motion and authorizing the Sale of Real Estate of the Debtors.

Dated: November 24, 2020



Gary E. Thompson, Esquire
882 S. Matlack Street, Suite 101
West Chester, PA 19382
610-431-3300

Attorney for the Debtor